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## S M I T H | V I L L A Z O R

September 1, 2021

### **VIA ECF**

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:     *United States v. Benjamin Delo, 20 Cr. 500 (JGK)***

Dear Judge Koeltl:

We write to respectfully request an exception to Defendant Benjamin Delo's conditions of pretrial release with respect to upcoming travel from Bermuda to New York, New York. As required, Mr. Delo has notified his Pretrial Services Officer of his itinerary, which has him arriving late Thursday afternoon, September 2, 2021, and departing on Monday morning, September 6, 2021, a federal holiday, to return to Bermuda. Due to short duration of the trip and the holiday weekend, the Pretrial Services Office has asked that we seek the approval of the Court for Mr. Delo to maintain possession of his U.K. passport on this trip rather than deliver it to his Pretrial Services Officer as would otherwise be required. (Dkt. No. 82.) The government has no objection to this application.

Respectfully submitted,

/s/ Patrick J. Smith

Patrick J. Smith  
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cc: AUSA Samuel Raymond